

FILED

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

SEP 17 2020  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA, )  
Plaintiff, )  
v. ) No.  
WILLIAM JACKSON and ) 4:20CR00559 SRC/SPM  
MELISSA JACKSON, )  
Defendants.

INDICTMENT

COUNT I

The Grand Jury charges that:

At all times pertinent to the charges in this indictment:

1. Federal law defines the term
  - (a) "minor" to mean any person under the age of eighteen years (18 U.S.C. § 2256(1));
  - (b) "sexually explicit conduct" to mean actual or simulated--
    - (i) sexual intercourse, including genital-genital, anal-genital, oral-genital, oral-anal, whether between persons of the same or opposite sex,
    - (ii) bestiality,
    - (iii) masturbation,
    - (iv) sadistic or masochistic abuse, or
    - (v) lascivious exhibition of the genitals, anus or pubic area of any person (18 U.S.C. §2256(2)(A)); and

(c) "computer" to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. §2256(6));

(d) "child pornography" to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where-

(A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or

(C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct. (18 U.S.C. §2256(8)).

2. On or between about November 1, 2019 and April 29, 2020, within the Eastern District of Missouri and elsewhere,

**WILLIAM E. JACKSON and MELISSA JACKSON,**

the Defendants herein, while aiding and abetting each other, did knowingly employ, use, persuade, induce, entice and coerce a minor, J.B., to engage in sexually explicit conduct, including a lascivious display of the genitals of J.B., touching the clothed buttocks of J.B. with the a penis, and said sexually explicit conduct was for the purpose of producing a visual depiction of such conduct, to wit: images of the lascivious display of the genitals of J.B. and contact between the clothed buttocks of J.B. and a penis, and such depictions were transported or transmitted in or affecting interstate and foreign commerce and were produced using materials, to-wit: an Apple Iphone 11 cellular telephone, that had been mailed, shipped, or transported in

interstate and foreign commerce, in violation of Title 18, United States Code, Section 2251(a) and punishable under Title 18, United States Code, Section 2251(e).

A TRUE BILL.

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FOREPERSON

JEFFREY B JENSEN  
United States Attorney

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JILLIAN S. ANDERSON, #53918(MO)  
Assistant United States Attorney  
jillian.anderson@usdoj.gov